

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SCOTT MICHAEL ELAM,

Defendant.

INDICTMENT

_____/

The Grand Jury charges:

COUNT 1
(Sexual Exploitation of a Minor)

On or about April 16, 2024, in Kent County, in the Southern Division of the
Western District of Michigan,

SCOTT MICHAEL ELAM

knowingly used, persuaded, induced, and enticed a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of that conduct, and the visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

Specifically, SCOTT MICHAEL ELAM used a Blink camera to record himself having oral-genital and genital-genital sexual intercourse with Minor Victim 1, a minor. SCOTT MICHAEL ELAM received, saved, reproduced, and possessed the images on a Samsung cell phone. The Blink camera and Samsung cell phone were manufactured outside the State of Michigan.

18 U.S.C. § 2251(a), (e)

18 U.S.C. § 2256(2)

COUNT 2
(Sexual Exploitation of a Minor)

On or about May 8, 2024, in Kent County, in the Southern Division of the Western District of Michigan,

SCOTT MICHAEL ELAM

knowingly used, persuaded, induced, and enticed a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of that conduct, and the visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

Specifically, SCOTT MICHAEL ELAM used a Blink camera to record himself having genital-genital sexual intercourse with Minor Victim 1, a minor. SCOTT MICHAEL ELAM received, saved, reproduced, and possessed the videos on a Samsung cell phone. The Blink camera and Samsung cell phone were manufactured outside the State of Michigan.

18 U.S.C. § 2251(a), (e)

18 U.S.C. § 2256(2)

COUNT 3
(Sexual Exploitation of a Minor)

On or about May 27, 2024, in Kent and Allegan Counties, in the Southern Division of the Western District of Michigan,

SCOTT MICHAEL ELAM

knowingly persuaded, induced, and enticed a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of that conduct, and the visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer and the visual depictions were actually transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate commerce.

Specifically, SCOTT MICHAEL ELAM directed Minor Victim 2, a minor, to record herself engaged in sexually explicit conduct. Minor Victim 2 recorded videos of herself masturbating and lasciviously exhibiting her genitals and pubic area, then sent the videos to SCOTT MICHAEL ELAM via SnapChat, an internet application. SCOTT MICHAEL ELAM received, saved, reproduced, and possessed the videos on a Samsung cell phone that was manufactured outside the State of Michigan.

18 U.S.C. § 2251(a), (e)
18 U.S.C. § 2256(2)

COUNT 4
(Sexual Exploitation of a Minor)

On or about March 26, 2024, in Kent County, in the Southern Division of the Western District of Michigan,

SCOTT MICHAEL ELAM

knowingly persuaded, induced, and enticed a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of that conduct, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer and the visual depiction was actually transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate commerce.

Specifically, SCOTT MICHAEL ELAM directed Minor Victim 3, a minor, to record herself engaged in sexually explicit conduct. Minor Victim 3 recorded a video of herself masturbating and lasciviously exhibiting her genitals and pubic area, then sent the video to SCOTT MICHAEL ELAM via SnapChat, an internet application. SCOTT MICHAEL ELAM received, saved, reproduced, and possessed the videos on a Samsung cell phone that was manufactured outside the State of Michigan.

18 U.S.C. § 2251(a), (e)

18 U.S.C. § 2256(2)

COUNT 5
(Sexual Exploitation of a Minor)

On or about March 1, 2024, in Kent and Barry Counties, in the Southern Division of the Western District of Michigan,

SCOTT MICHAEL ELAM

knowingly used, persuaded, induced, and enticed a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of that conduct, and the visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer and the visual depictions were actually transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate commerce.

Specifically, SCOTT MICHAEL ELAM directed Minor Victim 4, a minor, to record herself engaged in sexually explicit conduct. Minor Victim 4 recorded a video of herself masturbating and lasciviously exhibiting her genitals and pubic area, then sent the video to SCOTT MICHAEL ELAM via SnapChat, an internet application. SCOTT MICHAEL ELAM received, saved, reproduced, and possessed the videos on a Samsung cell phone that was manufactured outside the State of Michigan.

18 U.S.C. § 2251(a), (e)

18 U.S.C. § 2256(2)

COUNT 6
(Sexual Exploitation of a Minor)

On or about May 14, 2024, in Kent and Barry Counties, in the Southern Division of the Western District of Michigan,

SCOTT MICHAEL ELAM

knowingly used, persuaded, induced, and enticed a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of that conduct, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer and the visual depiction was actually transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate commerce.

Specifically, SCOTT MICHAEL ELAM directed Minor Victim 4, a minor, to record herself engaged in sexually explicit conduct. Minor Victim 4 recorded a video of herself masturbating and lasciviously exhibiting her genitals and pubic area, then sent the video to SCOTT MICHAEL ELAM via SnapChat, an internet application. SCOTT MICHAEL ELAM received, saved, reproduced, and possessed the videos on a Samsung cell phone that was manufactured outside the State of Michigan.

18 U.S.C. § 2251(a), (e)

18 U.S.C. § 2256(2)

COUNT 7
(Sexual Exploitation of a Minor)

On or about June 20, 2024, in Kent and Barry Counties, in the Southern Division of the Western District of Michigan,

SCOTT MICHAEL ELAM

knowingly used, persuaded, induced, and enticed a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of that conduct, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer and the visual depiction was actually transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate commerce.

Specifically, SCOTT MICHAEL ELAM directed Minor Victim 4, a minor, to record herself engaged in sexually explicit conduct. Minor Victim 4 took a picture of the lascivious exhibition of her genitals and pubic area, then sent the picture to SCOTT MICHAEL ELAM via SnapChat, an internet application. SCOTT MICHAEL ELAM received, saved, reproduced, and possessed the picture on a Samsung cell phone that was manufactured outside the State of Michigan.

18 U.S.C. § 2251(a), (e)

18 U.S.C. § 2256(2)

FORFEITURE ALLEGATION

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 2253.

Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in violation of 18 U.S.C. §§ 2251, as charged in this Indictment,

SCOTT MICHAEL ELAM

shall forfeit to the United States of America any visual depiction described in 18 U.S.C. § 2251 any matter which contains any such visual depiction that was produced, transported, mailed, shipped, and received in violation of Title 18, United States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses or any property traceable to such property, including but not limited to a Samsung cell phone (IMEI: 354082113113104).

18 U.S.C. § 2253
18 U.S.C. § 2251
18 U.S.C. § 2256

MARK A. TOTTEN
United States Attorney



OLIVIA K. GHISELLI
JONATHAN ROTH
Assistant United States Attorneys

A TRUE BILL

[/s/ Redacted]

GRAND JURY FOREPERSON